UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MASSACHUSETTS

NORTH AMERICAN SPECIALTY INSURANCE COMPANY)))
Plaintiff)
v) CIVIL ACTION NO: 04-10374WGY
MARY & JOSEPHINE CORP. and MATTEO RUSSO)))
Defendants)))

ASSENTED TO MOTION TO EXTEND TIME FOR COMPLETING SETTLEMENT

NOW COMES the Plaintiff, and states as follows:

- 1. Pursuant to the Court's settlement order, the settlement was to be completed by June 8, 2006.
- 2. Although the parties have worked diligently to agree on the settlement papers, the settlement will not be fully consummated by that date. The parties anticipate that the releases will be forwarded to Mary & Josephine Corp. and Matteo Russo very shortly, and that the settlement funds will be available for distribution shortly thereafter.
- 3. Accordingly, North American Specialty requests a brief extension of the time for completing settlement to June 22, 2006.
- 4. Counsel for Mary & Josephine and Matteo Russo have been contacted, and assent to this motion.

WHEREFORE, North American Specialty Insurance Company, Inc. respectfully requests that the Court extend the time for completing settlement to June 22, 2006.

Dated: June 5, 2006

NORTH AMERICAN SPECIALTY INSURANCE COMPANY

/s/ Leonard W. Langer, Esq. Its counsel

Tompkins, Clough, Hirshon & Langer, P.A. Three Canal Plaza P.O. Box 15060 Portland, ME 04112-5060 (207) 874-6700 lwlanger@tchl.com

CERTIFICATE OF SERVICE

I, Leonard W. Langer, hereby certify that on June 5, 2006, I electronically filed the within document with the Clerk of the Court using the CM/ECF system which will send a notification of such filing(s) to the following: Bertram E. Snyder, Esq., Looney & Grossman, 101 Arch Street, Boston, MA 02110-1112, counsel for Defendant Mary & Josephine, Inc., and to Joseph G. Abromovitz, Esq., 858 Washington St., Dedham, MA 02026, counsel for Defendant Matteo Russo.

/s/ Leonard W. Langer

NAS/M&J NAS Mot to Extend